

MEMO ENDORSED

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July 7, 2008

VIA TELECOPIER

Fax: (212)-805-6326
Hon. Colleen McMahon
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 640
Courtroom 21B
New York, NY 10007

Re: Brave Bulk Transport Ltd. v. Spot On Shipping Ltd.
07 CV 4546 (CM)
Our File: 500126.0036

Dear Judge McMahon:

We represent Zhanggang Shipping Ltd. ("ZSL") in the referenced action. With respect to your decision of July 2, 2008 (See Endorsed Memo, copy enclosed) for the sake of the record, we wish to clarify that the proceeding in London in which ZSL has applied to intervene is a lawsuit before the Commercial Court, not an arbitration.

Respectfully yours,

USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 7/8/08

By:

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EJO:po
Enc.

7/8/08
Case stayed
until London lawsuit
is concluded
Colleen McMahon

cc.: Tisdale Law Offices LLC
Attn: Thomas L. Tisdale, Esq.
Lauren C. Davies, Esq.
Fax: (203) 254-1641

06/27/2008

Case 1:07-cv-04546-CM Document 44

Filed 07/03/2008

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June 27, 2008

USDS SDNY**DOCUMENT****ELECTRONICALLY FILED**

DOC #:

DATE FILED: 7/3/08

MEMO ENDORSED**VIA TELECOPIER***7/2/08*
Case stayed
until London
rule 37 in re -
put in suspension
calendar
C
**Fax: (212)-805-6326
Hon. Colleen McMahon
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 640
Courtroom 21B
New York, NY 10007****Re: Brave Bulk Transport Ltd. v. Spot On Shipping Ltd.
07 CV 4546 (CM)
Our File: 500126.0036****Dear Judge McMahon:****As you are aware, we are the attorneys for Zhanggang Shipping Ltd. ("ZSL"). We refer to our letters to the Court of June 3 and 11, Your Honor's Memorandum Endorsement of June 12, opposing counsel's letters of June 13 and 19 and our response of June 20.****We respectfully submit that Brave Bulk Transport Ltd. ("Brave Bulk") has not come up with a "very surprising argument" that should change Your Honor's inclination to stay this case.****In addition, we wish to report that ZSL's solicitors in London will be attending the Commercial Court in London on July 1 to fix a date for a hearing on their application to intervene (see attached letter from Holman Fenwick Willan to Brave Bulk's solicitors dated June 27, 2008). Moreover, for the avoidance of any doubt, we wish to inform this Court that ZSL's solicitors will be submitting further evidence to the Commercial Court**

08/27/2008

15:51 Chalos, O'Connor & Duffy LLC.

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Filed 07/03/2008

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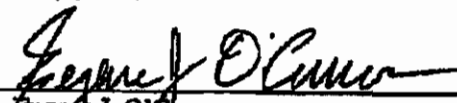
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in London to support a request that the London Court determine the issue of the alleged "alter ego" type connection between Spot On Shipping Limited and ZSL.

We shall promptly advise this Court of the outcome of the London proceeding. Meanwhile, the wire transfers of ZSL attached by Brave Bulk in New York banks pursuant to Rule B will remain attached.

Respectfully yours,

By:



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Enc.

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